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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA,)	NO. CR 19-604-2 RS
)	
Plaintiff,)	STIPULATION AND ORDER TO CONTINUE
)	HEARING AND TO EXCLUDE TIME UNDER
v.)	THE SPEEDY TRIAL ACT
)	
ANDREW QUINTERO,)	
)	
Defendant.)	

The parties appeared before this Court in the above-captioned matter on November 9, 2020 for a status conference. Dkt. 106 (Min. Entry). The next hearing in this case is a change of plea hearing on August 23, 2021. Dkt. 154 (Clerk's Not.).

The parties stipulate and agree that the United States has produced discovery materials and an opportunity for case resolution to defense counsel. Defense counsel requires more time to review the case materials with defendant and to continue discussions with the United States about the opportunity for case resolution.

Thus, the parties stipulate and request that the August 30, 2021 hearing be continued to September 20, 2021 at 1:00 p.m.

The parties also stipulate and agree it would be appropriate to exclude the time from August 30,

2021 through September 20, 2021 under the Speedy Trial Act, to allow for effective preparation of counsel, taking into account the exercise of due diligence. *See* 18 U.S.C. §§ 3161(h)(7)(A), (B)(iv). The parties further stipulate and agree that the ends of justice served by excluding the time from August 30, 2021 through September 20, 2021 from computation under the Speedy Trial Act outweigh the best interests of the public and defendant in the prompt resolution of this case. *See id.*

The undersigned Assistant United States Attorney certifies that she has obtained approval from counsel for defendant to file this stipulation and proposed order.

IT IS SO STIPULATED.

DATED: August 25, 2021

/s/ Christina Liu

CHRISTINA LIU

Assistant United States Attorney

DATED: August 25, 2021

/s/ with permission

ADAM G. GASNER

Attorney for Defendant Andrew Quintero

ORDER

Based upon the representations of counsel and for good cause shown, the Court finds that failing to exclude the time from August 30, 2021 through September 20, 2021 would unreasonably deny defense counsel and defendant the reasonable time necessary for effective preparation, taking into account the exercise of due diligence. *See* 18 U.S.C. §§ 3161(h)(7)(A), (B)(iv).

The Court further finds that the ends of justice served by excluding the time from August 30, 2021 through September 20, 2021 from computation under the Speedy Trial Act outweigh the best interests of the public and defendant in a speedy trial. *See* § 3161(h)(7)(A).

Therefore, and with the consent of the parties, IT IS HEREBY ORDERED that the time from August 30, 2021 through September 20, 2021 shall be excluded from computation under the Speedy Trial Act. *See id.*

Furthermore, IT IS HEREBY ORDERED that the hearing set for August 30, 2021 at 1:00 p.m. is continued to September 20, 2021 at 1:00 p.m.

IT IS SO ORDERED this 25th day of August, 2021.



THE HONORABLE RICHARD SEEBORG
United States District Judge